

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. No. 98-52

A-R CABLE SERVICES, INC.
A-R CABLE PARTNERS
CABLEVISION OF FRAMINGHAM, INC.
CHARTER COMMUNICATIONS
GREATER WORCESTER CABLEVISION,
INC.
MEDIAONE OF MASSACHUSETTS, INC.
MEDIAONE OF PIONEER VALLEY, INC.
MEDIAONE OF SOUTHERN NEW
ENGLAND, INC.
MEDIAONE OF WESTERN NEW
ENGLAND, INC.
MEDIAONE ENTERPRISES, INC.
MEDIAONE OF NEW ENGLAND, INC.
PEGASUS COMMUNICATIONS
TIMER WARNER CABLE

Complainants,

v.

MASSACHUSETTS ELECTRIC
COMPANY

Respondent.

**FIRST SET OF INFORMATION REQUESTS OF MASSACHUSETTS ELECTRIC
COMPANY TO COMPLAINANTS**

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|--------|--|
| MECO-1 | Please provide the current construction procedures and specifications for each of the Complainants, including any construction manuals or standards books. |
| MECO-2 | Please state whether each of the Complainants adheres to the NESC regarding its own overhead plant (1) construction, (2) operations and (3) maintenance. |

- MECO-3 Does the NESC ever permit communications lines or equipment and electrical lines to be separated by less than 40"? If yes, please describe those circumstances.
- MECO-4 Does the NESC ever permit communications lines or equipment to be installed below 18' above ground? If yes, please explain those circumstances and identify any attachment fees paid for those attachments.
- MECO-5 Has any Complainant or any affiliate of one of the Complainants constructed or offered to construct communications lines to be attached to poles, overlashed on cables or wires attached to poles or within conduits of Massachusetts Electric for use by other parties for communications purposes? If yes, please provide details of these transactions, identify the revenues derived from these transactions, and identify the portion of pole attachment fees attributed to these transactions.
- MECO-6 For each Complainant, please identify the total gross revenues from all services provided in Massachusetts. Please separately identify revenues from cable television services, other retail communications services (such as telephony, internet and online banking services) and wholesale services (including but not limited to dark fiber leases).
- MECO-7 Please provide the number of cable television customers served by each Complainant as of today's date.
- MECO-8 For each Complainant, please provide data showing what percentage of cable television rates are attributable to (1) cable boxes, (2) remote controls, (3) lines, (4) line equipment, (5) programming, (6) salaries, (7) pole attachment fees, (8) other operating expenses and (9) profits.
- MECO-9 For each Complainant, please identify the total pole attachment fees paid to Massachusetts Electric. Please separately identify the portion of these pole attachment fees attributed to each of the operations identified in the responses to question 5
- MECO-10 Based on each Complainant's records, please provide the number of attachments to poles owned solely or jointly by Massachusetts Electric. Please describe (1) how each Complainant determined its attachment quantities and (2) the records on which these are based on. Please provide the pole attachment records used to support the response to MECO-9.
- MECO-11 For each Complainant, please describe (1) all affiliates, including companies owned, in whole or in part, by the Complainant; (2) companies owning, in whole or in part, the Complainant; (3) companies owned, in whole or in part, by owners, in whole or in part, of the Complainant; (4) any holding company arrangements; and (5) affiliated companies with interlocking directorates.

- MECO-12 Complainants use a 26% factor for deducting appurtenances from MECo's gross pole investment, while MECo uses the 15% factor adopted by the Department and the FCC. Please cite to any orders issued by the Department or the FCC which have subsequently defined the appurtenance factor as a rebuttable presumption.
- MECO-13 Please describe and provide all information relevant to:
1. the training received by communications workers;
 2. the qualifications of communications workers to work in the safety space, and
 3. the cost and expense of equipment used by communications workers for placing attachments on utility poles.
- MECO-14 Please provide the briefs filed by NECTA and any of the individual Complainants in DPU/DTE 97-82.
- MECO-15 Please indicate whether any of the Complainants owns or has considered owning poles for attaching CATV wires. Please explain why each Complainant does or does not own poles.
- MECO-16 For each Complainant, please indicate the date on which each first attached to MECo poles. Please provide gross revenue data for each Complainant in each year commencing with its initial attachment to MECo poles through 1997.
- MECO-17 Please describe any services that CATV operators are required to provide by law.
- MECO-18 Please provide the most recent annual report of each Complainant.